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marriage. See *Miller v. Clark*, 23 Ind. 370, 376. As the marriage relation still exists after the wife's death, even arrears of alimony are not collectible, for they then belong to her husband. *Stones v. Cooke*, 8 Sim. 321 n. Cf. *Clark v. Clark*, 6 W. & S. (Pa.) 85. However, the wife's personal representative might recover for the benefit of her creditors for necessities. *Clark v. Clark*, *supra*; *Bouslough v. Bouslough*, 68 Pa. St. 495. Again, when the amount is settled by the court and is due, the wife has no longer merely a right to alimony but something very closely resembling a judgment debt. *Gerrein's Adm'r v. Michie*, 122 Ky. 250, 91 S. W. 252; *Howard v. Howard*, 15 Mass. 196. See *Coffman v. Finney*, 65 Oh. St. 61, 61 N. E. 155. Cf. *Carr v. Risher*, 119 N. Y. 117, 23 N. E. 296. Then, however, it is treated as a personal right in that it is neither assignable, attachable, nor subject to a lien. *Fournier v. Clutton*, 146 Mich. 298, 109 N. W. 425; *Lynde v. Lynde*, 64 N. J. Eq. 736, 52 Atl. 694; *Romaine v. Chauncey*, 129 N. Y. 566, 29 N. E. 826; *West v. Washburn*, 153 N. Y. App. Div. 460, 138 N. Y. Supp. 230; *Matter of Bolles*, 78 N. Y. App. Div. 180, 79 N. Y. Supp. 530. But the principal case is in accord with the weight of American authority in holding that a decree for alimony is personal only in the sense that the wife cannot divert it to other uses than for her maintenance. *Miller v. Clark*, *supra*; *Gerrein's Adm'r v. Michie*, *supra*. See *Dinet v. Eigemann*, 80 Ill. 274, 279; *Coffman v. Finney*, *supra*. *Contra*, *Faversham v. Faversham*, 161 N. Y. App. Div. 521, 146 N. Y. Supp. 569.

EQUITY — WASTE — RIGHT OF HOLDER OF *INTERESSE TERMINI* TO PROTECTION BY INJUNCTION. — The owner of an *interesse termini* brought a bill in equity to restrain the vacating tenant from removing a garage on the leased premises. *Held*, that an injunction will be granted. *Evans v. Prince's Bay Oyster Co.*, 154 N. Y. Supp. 279.

The common-law action of waste was available only to the immediate estate of inheritance, and an action on the case in the nature of waste might be brought by the reversioner or remainderman for life or years. Note to *Greene v. Cole*, 2 Wms. Saunders 252 a; but see AMES, CASES ON EQUITY, 468 n. 1. But relief by injunction is of much wider application, equity having protected such remote interests as contingent remainders, estates of trustees to preserve contingent interests, interests of infants *en ventre sa mère*, executory devises, and future charges on realty. *Watson v. Wolff-Goldman R. Co.*, 95 Ark. 18, 128 S. W. 581; *Gordon v. Lowther*, 75 N. C. 193; *Williams v. Duke of Bolton*, 3 P. Wms. 268 n.; *Lutterel's Case*, Prec. in Ch. 50; *Robinson v. Litton*, 3 Atk. 209; *Turner v. Wright*, 2 DeG. F. & J. 234; *Dawson v. Tremaine*, 93 Mich. 320. And even the inchoate right of dower has been protected. *Brown v. Brown*, 94 S. C. 492, 78 S. E. 447. *Contra*, *Rumsey v. Sullivan*, 150 N. Y. Supp. 287. See 28 HARV. L. REV. 615. Hence the court seems fully justified in protecting such a substantial interest as that held by an incoming tenant. *Palmer v. Young*, 108 Ill. App. 525.

EVIDENCE — LEGISLATIVE RECORDS — ADMISSIBILITY OF PAROL EVIDENCE TO CONTRADICT THE RECORD. — In a petition for a *mandamus* to compel the publication of a certain bill, among the acts of the legislature, the plaintiff offered oral evidence to prove that before the governor vetoed the bill, he signed it with intent to approve it. *Held*, that the evidence is not admissible. *Arkansas State Fair Association v. Hodges*, 178 S. W. 936 (Ark.).

As parol evidence as to legislative proceedings is untrustworthy, and as it is essential that the validity and wording of statutes be absolutely certain, it is a general rule that in an action concerning a statute, parol evidence is not admissible to contradict the record. *Attorney-General v. Rice*, 64 Mich. 385, 31 N. W. 203; *Wade v. Atlantic Lumber Co.*, 51 Fla. 638, 41 So. 72; *State v. Armour Packing Co.*, 135 N. C. 62, 47 S. E. 411. See 2 WIGMORE, EVIDENCE, § 1350 (3). However, when a bill has left the legislature, as it is dealt with